



Outlook

submission to: News Bargaining Incentive Revenue Distribution—Statutory Payment Scheme [SEC=OFFICIAL]

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Submitted on 4 May 2026

Submitted by: Anonymous

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Yes

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Yes

Published name

Have a Go News

Short comment

Have a Go News urges the Government to recognise the vital role of small, community focused publishers in Australia's media landscape. For 35 years, the publication has provided a trusted voice for older Australians through its print, digital and social platforms. A dedicated support pathway within the News Media Bargaining Code is essential to ensure smaller publishers receive fair access to funding, recognition and inclusion in national media frameworks.

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Consultation name

News Bargaining Incentive Revenue Distribution—Statutory Payment Scheme

OFFICIAL

Submission: News Bargaining Incentive

Recognition and Support for Small Publishers in the News Media Framework

Introduction

Have a Go News welcomes the opportunity to contribute to the discussion on the future of the News Media Bargaining Code and the proposed **News Bargaining Incentive**. As a long-standing Western Australian publication, we wish to highlight the challenges faced by smaller, community-focused publishers in accessing recognition and support under existing frameworks.

Background

Have a Go News has proudly served the Western Australian community for 35 years, promoting healthy ageing through activity and engagement. The publication delivers its message through multiple platforms — a widely distributed hard copy newspaper, an electronic edition, a national website and active social media pages — ensuring accessibility for readers across Australia.

Our publication provides a vital communication platform for older Australians, offering targeted news, lifestyle information and opportunities for participation in community life.

Despite our consistent contribution to public interest journalism and community wellbeing, our attempt to join the Australian Communications and Media Authority (ACMA) was effectively ignored.

This experience reflects a broader issue — smaller publishers, particularly those outside the commercial mainstream, often struggle to gain access to the same recognition, support and opportunities afforded to larger media organisations.

The Case for a Special Service for Small Publishers

Smaller publishers like *Have a Go News* play a crucial role in ensuring that all Australians — including older citizens, regional communities and underrepresented groups — have access to relevant, trustworthy and inclusive information. However, the current regulatory and funding structures do not adequately reflect the diversity of the media landscape or the value of community-based journalism.

A dedicated service or framework within ACMA, or a similar body, should be established to:

- Recognise and support small and independent publishers that deliver public interest journalism.
- Provide streamlined access to registration, accreditation and funding opportunities.
- Facilitate inclusion in national media initiatives and bargaining frameworks.
- Ensure that smaller publishers are represented in policy discussions that shape the future of Australian media.

The Importance of Inclusion

The exclusion of smaller publishers from key media mechanisms undermines the diversity and resilience of Australia's information ecosystem. Publications like *Have a Go News* contribute to civic engagement, social connection and public health

outcomes — all of which align with government objectives to support informed, active and connected communities.

Recommendation

The Government should establish a **Special Service Access Pathway** for small and community publishers within the News Media Bargaining Code and related frameworks. This pathway would ensure that long-standing, community-serving publications such as *Have a Go News* are recognised for their contribution and supported to continue delivering trusted, targeted news to their audiences.

Conclusion

For 35 years, *Have a Go News* has provided a voice for older Australians in Western Australia, promoting healthy ageing and community participation. We urge the Government to recognise the essential role of smaller publishers and to create mechanisms that ensure equitable access to support, accreditation and funding. A truly representative and sustainable media landscape must include the voices of all Australians — not just those of the largest media organisations.



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submission to nbi consultation paper.pdf;

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Submitted on 18 May 2026

Submitted by: Anonymous

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Step 1: Your submission

Remain Anonymous

No

Private Submission

Yes

Published name

Australian Community Media (ACM)

Short comment

Please find attached ACM's submission to the News Bargaining Incentive consultation on revenue distribution.

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- [submission-to-nbi-consultation-paper.pdf](#) (136.51 KB)

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Consultation name

News Bargaining Incentive Revenue Distribution—Statutory Payment Scheme

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conexus statutory payment scheme consultation submission.pdf;

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No

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Yes

Published name

Conexus Financial Pty Ltd

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Consultation name

News Bargaining Incentive Revenue Distribution—Statutory Payment Scheme

OFFICIAL



Outlook

submission to: News Bargaining Incentive Revenue Distribution—Statutory Payment Scheme
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Yes

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Yes

Published name

Daily Mail Australia

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- [news-bargaining-incentive-rev-distribution-consulation_0.docx](#) (28.78 KB)

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Consultation name

News Bargaining Incentive Revenue Distribution—Statutory Payment Scheme

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AU: News Bargaining Incentive Consultation on Revenue Distribution

Q1: Do you have any concerns with the proposed registration and application process?

No

Q2: Would your organisation meet the criteria as set out under the ACMA register? If not, please explain which component of the eligibility criteria may cause an issue.

Yes

Q3: Is the proposed eligibility criteria fit-for-purpose in ensuring that the scheme supports continued investment in public interest news; diversity of media voices; and quality journalism?

Yes

Q4: Do any of the proposed eligibility criteria present significant costs or administrative burden for your organisation?

No

Q5: Is FTE journalists a good approximation for investment in news and journalism, and an appropriate basis for determining payments to the sector?

While we understand the attractiveness of this simple measure, and the policy aim of keeping the administrative burden for new organisations low, it fails to adequately capture the true cost of investment in newsgathering - where payrolled editorial staff are supported by freelance journalists and photographers to provide a rich editorial product.

Coupled with proposals to upweight the number of eligible FTE journalists for small and regional publishers, who are more likely to have payrolled staff than freelance support, this measure risks penalising publishers who have both a permeant and freelance staff base. The flexibility provided by freelance journalists and photographers allows newsrooms to adapt to a fast-paced news environment, delivering an overall higher quality product to the consumer.

We estimate that only approximately 75% of our newsgathering investment is represented by the proposed FTE measure.

Q6: Are the identified editorial roles clear and fit-for-purpose? Are there other roles that should be included?

Broadly, noting the response to Q5.

Q7: Do the proposed evidentiary requirements present any specific difficulties, or a sizeable burden, for your business? Are there any risks arising from these evidentiary requirements?

The detail of the audit process for confirming the "nature of the role" for individuals who are employed in an editorial capacity is unclear. This should be light touch and not risk impeding on the fundamental principles of press freedom, for example by requiring individual journalists to evidence the sources of their news gathering. A statutory declaration by the news organisation would be acceptable.

Q8: Are the proposed weighting categories an appropriate and effective means of accounting for the economies of scale and resourcing differences across the sector; and meeting the objectives of the Statutory Payment Scheme?

Again, the proposed design fails to recognise the contribution of freelance and contract workers to the overall investment in newsgathering, especially in remote and regional communities, where a national newsroom such as the Daily Mail may invest significantly around relevant news events, but not have permanent presence on the ground. If the policy intent is to support news

reporting in remote and regional communities the weighing should factor in a news organisations broader investment beyond FTE location.

Q9: What weighting values would best achieve these aims?

N/A

Q10: Is the proposed retention obligation an appropriate measure to ensure that funding provided to the sector delivers against a clear and valid public purpose?

The retention objective is reasonable approach to protect funds distributed under the SPS and ensure they are utilised for the intended purpose, however the current proposal fails to recognise potential economic reality. For example, where newsrooms are required to make efficiencies as a result of wider economic downturn or financial circumstances beyond their control (eg Covid pandemic), to then further penalise a news organisation by clawing back funds distributed under the SPS would be detrimental to the policy aim of contributing to the sustainability of Australian news and journalism.

A less rigid mechanism should be adopted, say 80% FTE retention over the reporting period, which would provide news organisations with flexibility to adjust their workforce to variable economic reality, as per normal business practices.

Q11: Are there any risks or other issues we should take into consideration with regard to the retention obligation, including time periods and tolerance thresholds?

Yes, see Q10.

Q12: What penalties should apply for organisations that are later found to have mis-reported their eligibility or employment practices?

N/A

Q13: Do you have any concerns about the general approach to regular reporting and an event-based notification framework?

N/A

Q14: What lead-in time would you require for information required under regular reporting and event-based notices? Do you have any concerns about the feasibility of collecting this information, the timing or sequencing of obligations, or disclosure of commercially sensitive information?

Six months after the end of the reporting period.

Q15: Do you have any concerns or views about penalties under the scheme, including the thresholds and penalties for serious non-compliance?

N/A



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win network nbi submission may2026 distribution.docx;

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Remain Anonymous

Yes

Private Submission

Yes

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WIN Network

Upload attachments

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- [win-network nbi submission may2026-distribution.docx](#) (35.92 KB)

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Consultation name

News Bargaining Incentive Revenue Distribution—Statutory Payment Scheme

OFFICIAL

WIN Network

Submission to the Department of Infrastructure, Transport,
Regional Development, Communications and the Arts

News Bargaining Incentive – Revenue Distribution Statutory Payment Scheme Consultation

18 May 2026

Submitted to: news.journalism@communications.gov.au

1. Executive Summary

WIN Network (WIN) is one of Australia's largest regional commercial television broadcasters, operating across regional New South Wales, Victoria, Queensland, South Australia, Tasmania, the Northern Territory and the Australian Capital Territory. WIN employs approximately 100 journalism staff and a further 25 staff directly and exclusively associated with the production of its news programming.

WIN produces nothing but regional news. Unlike metropolitan commercial broadcasters for whom news drives ratings and advertising revenue, WIN's news operation costs approximately \$16 million annually and returns little to no direct revenue. It is a regulatory and community service obligation, cross-subsidised from WIN's other operations.

WIN welcomes the Consultation Paper's explicit consideration of broader role-based and cost-based alternatives to a pure headcount formula, considers these well-suited to its circumstances, and actively supports robust validation of any claims made under a broadened formula.

WIN's key positions are:

- WIN supports the use of the existing ACMA registration process as the basis for eligibility under the Statutory Payment Scheme.
- WIN welcomes the Consultation Paper's explicit consideration of broader role definitions and cost-based alternatives to a pure FTE journalist headcount formula. Because WIN's entire operation is dedicated to regional news production, all production staff — including technical directors, producers, directors, camera operators and audio staff — are wholly attributable to core news content and should be recognised accordingly.
- WIN notes that in regional broadcasting, news presenters are not merely on-air talent. They function as story editors, production decision-makers and journalist mentors. Their exclusion from the eligible journalist definition does not reflect the reality of regional newsroom operations.
- WIN strongly supports the regional and remote weighting and recommends a two-tier structure incorporating an enhanced weighting for genuine news deserts.
- WIN is concerned that the small business weighting threshold of \$10 million excludes WIN despite its modest profitability. Revenue alone is a poor indicator of commercial capacity in regional broadcasting where structural costs are high.
- WIN supports the transparency objectives of the scheme but recommends that individual organisation payment data not be publicly disclosed at a granular level.

2. About WIN Network

WIN Network serves audiences across regional New South Wales, Victoria, Queensland, South Australia, Tasmania, the Northern Territory and the Australian Capital Territory. WIN operates exclusively in regional markets that have been disproportionately affected by the shift of advertising revenue to digital platforms.

WIN employs approximately 100 journalism staff and a further 25 staff directly and exclusively associated with news production technical directors, studio directors, producers, camera operators, audio technicians and graphics operators. All work solely on WIN's news output. WIN is registered with the ACMA as an eligible news business under the Code.

3. Responses to Consultation Questions

3.1 Eligibility

Q1: Registration and application process

WIN supports using the existing ACMA register as the basis for eligibility. This avoids duplication and the cost of establishing a parallel process. WIN recommends the legislation provide clear rights of merits review for payment allocation decisions.

Q2: Would WIN meet the ACMA eligibility criteria?

WIN believes so. WIN is in the process of registering with the ACMA as an eligible news business under the Code and does not identify any component of the eligibility criteria that would present difficulty.

Q3: Is the eligibility criteria fit for purpose?

WIN considers the eligibility criteria broadly fit for purpose. They appropriately target organisations committed to public interest journalism and WIN does not identify at this stage any component that would present difficulty for eligible regional broadcasters.

Q4: Administrative burden

The eligibility criteria do not present significant administrative burden for WIN. If the reporting framework adopts a prior year basis as WIN recommends at Q13 — burden will be further reduced, as organisations draw on existing audited records rather than forward-looking estimates.

3.2 Payment Allocation Formula

Q5: Is FTE journalists an appropriate basis for payment allocation?

WIN does not consider FTE journalist headcount alone to be an adequate basis for payment allocation, but welcomes the Consultation Paper's explicit consideration of broader alternatives and strongly supports their adoption.

For metropolitan broadcasters, news drives ratings and advertising revenue the investment is commercially self-justifying. WIN's news operation costs approximately \$16 million annually and returns little to no direct revenue. A headcount formula treats WIN identically to an organisation where the same journalist numbers generate substantial commercial return an outcome that does not reflect the public good character of WIN's investment.

Because WIN's entire operation is dedicated to regional news with no entertainment, sport or other genres all production staff are wholly engaged in core news content. WIN employs a further 25 staff, technical directors, studio directors, producers, camera operators, audio technicians and graphics operators whose roles are directly and exclusively associated with news production. Under the proposed FTE formula, these 25 staff would receive no recognition despite being as integral to WIN's output as the journalists themselves. Beyond staffing, regional television news production carries substantial operational costs broadcast equipment, transmission infrastructure, editing software and studio facilities that have no equivalent in print or digital newsrooms and are not captured by a headcount formula.

Recommendation: WIN recommends the payment allocation formula be broadened to recognise either (a) a wider range of eligible roles encompassing all staff primarily

engaged in core news content production, or (b) a cost-based approach drawing on audited production costs.

Q6: Are the identified editorial roles clear and fit for purpose?

WIN considers the exclusion of narrators, anchors and presenters inappropriate in a regional broadcasting context. In metropolitan markets, presenters primarily deliver content produced by others. In regional markets the model is fundamentally different — presenters routinely act as story editors, mentor junior journalists, lead production decisions and are often the most senior editorial figure in the building during a bulletin. Their contribution to core news content is central, not incidental.

Recommendation: WIN recommends the eligible role definition be expanded to recognise news presenters who perform material editorial functions — including story editing, journalist mentoring and production decision-making — as integral contributors to core news content in regional broadcasting contexts.

Q7: Evidentiary requirements

WIN considers the proposed framework of payroll information and statutory declarations to be reasonable and proportionate. If the formula is broadened to a cost-based approach, audited financial statements would be the natural evidentiary equivalent and WIN would welcome guidance from the administering body on that basis.

Recommendation: WIN supports the proposed evidentiary framework. If a cost-based formula is adopted, WIN recommends audited financial statements serve as the primary evidentiary basis.

3.3 Additional Support for Activities (Weightings)

Q8: Are the proposed weighting categories appropriate?

WIN supports weighting factors but considers the framework requires refinement in three areas.

Regional and remote weighting

WIN strongly supports this weighting concept. WIN's journalists are located in regional centres across its coverage area Wollongong, Canberra, Ballarat, Toowoomba, Darwin, Hobart and others and every journalist WIN employs serves a regional community.

WIN welcomes the weighting as recognition of the structural cost of regional journalism, but considers the proposed framework does not go far enough in addressing genuine news deserts, communities where local journalism is absent or critically under-resourced.

The Northern Territory is a clear example. Despite covering nearly a sixth of Australia's landmass and being home to significant First Nations communities, the Territory has extremely limited local news representation. The same pattern applies across remote Western Australia, outback Queensland and other areas where geography and economics combine to make sustainable journalism almost impossible under conventional funding models.

WIN recommends the weighting framework adopt a two-tier structure:

- A standard regional and remote weighting for journalists located in regional and remote areas as defined by the Australian Statistical Geography Standard; and
- An enhanced news desert weighting up to 100% of the cost of an eligible journalist role for journalists located in and producing news content for communities with demonstrably inadequate existing news coverage. Without coverage of the full cost of a journalist role, no commercial operator can justify the investment, and these communities will remain unserved.

The enhanced tier would function as a direct incentive for news organisations to establish or expand presence in the most underserved communities, rather than simply rewarding existing footprints.

Small business weighting and the revenue threshold gap

The small business weighting applies to organisations with revenue below \$10 million. WIN's revenue exceeds this threshold, but revenue is a poor indicator of commercial capacity where structural costs are high. WIN's news operation alone costs more than the entire small business revenue threshold, and returns little to no direct revenue. WIN's news operation runs at a net loss, funded from its other operations. Any funding received under the scheme would still leave WIN's news operation in deficit.

This is not an abstract concern. The current structure risks systematically excluding large regional broadcasters from commercial deal negotiations and platforms will perceive WIN as a large business and deprioritise it accordingly, while the financial reality is that WIN recovers nothing from producing news. The scheme should reflect that reality, not obscure it.

WIN recommends either recalibration of the small business threshold to account for regional broadcasting cost structures, or a separate weighting category for large regional operators where audited accounts demonstrate that news production generates little to no commercial return relative to cost weighted proportionally to the gap between news production cost and news-attributable revenue. For WIN, that gap is effectively the entirety of its \$16 million annual news cost.

Marginalised communities weighting

WIN supports this weighting and recommends it be broadly framed to capture the diversity of marginalised community coverage across regional Australia.

Recommendation: WIN recommends: (1) a two-tier regional weighting incorporating an enhanced news desert tier of up to 100% of journalist cost for communities with demonstrably inadequate news coverage; (2) recalibration of the small business threshold or a separate large regional operator weighting based on net news investment; and (3) a broadly framed marginalised communities weighting.

Q9: What weighting values would best achieve these aims?

WIN recommends a standard regional and remote weighting of no less than 40%, informed by the structural cost differential of attracting and retaining journalists in regional markets relative to metropolitan centres. WIN recommends the Government commission independent economic modelling to verify this figure before finalising values and is willing to provide cost data to support that process.

WIN acknowledges that no weighting value will fully resolve the underlying economics of regional news. In the current environment, regional broadcasters are unlikely to generate meaningful commercial return from news production regardless of the support available. The honest purpose of the weighting is not to make regional news commercially viable — it is to slow the rate at which it becomes unviable, and to sustain the journalists who serve communities that would otherwise go without coverage.

With that in mind, WIN does not seek to maximise weighting values beyond what is necessary to achieve that purpose. A well-targeted 40% regional weighting, combined with an enhanced tier for genuine news deserts and stackable marginalised communities weightings, would represent a meaningful and proportionate intervention.

WIN recommends the enhanced news desert weighting be set at a level sufficient to cover the full cost of a journalist role in the most underserved markets, recognising that without that threshold, no commercial operator will make the investment regardless of the subsidy available.

3.4 Payment Conditions

Q10: Is the retention obligation appropriate?

WIN has significant reservations about the retention obligation. Requiring minimum journalist numbers creates operational inflexibility that does not reflect the realities of regional broadcasting, where economic conditions and revenue changes can require rapid workforce adjustment. If payment allocations are based on historical audited data, as WIN recommends the rationale for a forward-looking retention obligation is substantially reduced, as payments would recognise journalism already delivered rather than journalism promised.

If a retention condition is nonetheless maintained, it should include a meaningful tolerance threshold and explicit provisions recognising that regional news organisations may need to reduce journalist numbers in response to genuine commercial pressures. Penalising organisations for reductions driven by deteriorating commercial viability would be counterproductive and it would accelerate the closure of regional news operations rather than sustain them.

Establishment incentive for news deserts

WIN raises a related but distinct concern. The retention obligation as proposed applies only to existing journalist numbers. It does not address the risk facing any organisation considering establishing a new presence in a news desert community.

A news organisation weighing whether to place a journalist in an underserved market faces genuine investment risk if the scheme does not continue, or if the organisation's circumstances change before the investment matures, it bears the full cost of establishment with no guarantee of return. This risk is a material deterrent to exactly the behaviour the scheme is trying to incentivise.

WIN recommends the scheme include a specific establishment incentive whether through a reserved portion of the distribution fund, a longer payment commitment period, or protected weighting status for journalist roles newly established in communities with demonstrably inadequate existing news coverage. Without some protection against establishment risk, the enhanced news desert weighting proposed under Q8 and Q9 will not achieve its objective.

Recommendation: WIN recommends payment allocations be determined on historical audited data, removing the need for a retention obligation. If a retention condition is maintained it should include a tolerance threshold and provisions that recognise deteriorating commercial viability as a legitimate basis for workforce adjustment. WIN further recommends the scheme include a specific establishment incentive mechanism for journalist roles newly created in news desert communities.

Q11: Risks and issues with the retention obligation

Key risks include: perverse incentives to maintain headcount for compliance rather than editorial reasons; regional fragility, regional markets are more susceptible to sudden revenue shocks than metropolitan markets, and a retention obligation that does not recognise commercial viability as a legitimate basis for workforce adjustment will penalise organisations for circumstances beyond their control; and unnecessary monitoring burden on the administering body. These risks are substantially eliminated if the scheme adopts a historical audited data model as WIN recommends.

Q12: Penalties for mis-reporting

WIN does not support penalties for mis-reporting. If allocations are based on historical audited data as WIN recommends that information can be independently verified at the time of application, removing the practical need for a penalties regime. Robust verification of audited records is a more effective integrity mechanism than after-the-fact penalties.

3.5 Administration of the Scheme

Q13: Regular reporting and notification framework

WIN strongly recommends the reporting framework be structured around the prior financial year. Historical data is verifiable and accurate; forward-looking estimates expose organisations to compliance risk for circumstances outside their control. Prior year reporting is consistent with standard financial reporting practice and removes that risk entirely.

WIN does however recognise that material structural changes, such as the acquisition or disposal of news assets, closure of news operations, or significant changes to corporate structure, should be notified to the administering body promptly rather than waiting for the next reporting cycle. An event-based notification obligation for structural changes of this kind is appropriate and WIN supports it.

Commercially sensitive allocation data should not be publicly disclosed at the individual organisation level. Aggregate industry figures are appropriate; individual payment details are not.

Q14: Lead-in time and feasibility

If the scheme adopts a prior year audited data model as WIN recommends, lead-in time requirements are minimal, the relevant data already exists in audited financial statements and payroll records. WIN would not require significant additional systems or processes to comply.

WIN does recommend early publication of the detailed evidentiary framework so that organisations can confirm their existing records will satisfy the requirements, and address any gaps well ahead of the first application period.

Q15: Penalties for non-compliance

Consistent with WIN's position at Q12, WIN does not support a penalties regime where allocations are based on historical audited data. Verified historical records remove the practical basis for most compliance concerns.

If a penalties regime is nonetheless adopted, WIN cautions strongly against automatic or punitive penalties for organisations that fail to maintain journalist numbers due to genuine commercial pressures. As noted at Q10 and Q11, regional news organisations are particularly vulnerable to sudden revenue shocks, and a penalties regime that does not distinguish between deliberate non-compliance and commercially-driven workforce adjustment would accelerate the closure of the very operations the scheme is designed to sustain.

Any penalties regime should be proportionate, graduated, and subject to merits review, with explicit recognition that deteriorating commercial viability is a legitimate mitigating factor.

Conclusion

WIN welcomes the Government's commitment to establishing the News Bargaining Incentive and the Statutory Payment Scheme. WIN is one of Australia's largest regional news operations and produces nothing but local journalism, yet under the framework as currently designed, WIN risks being treated as a large commercial business rather than what it actually is: a regional broadcaster running its news operation at a structural loss as a public interest investment in communities that would otherwise go without coverage.

This distinction matters. If the scheme does not account for it through the payment formula and the weighting framework WIN and operators like it will be systematically disadvantaged in the distribution of scheme revenue. Platforms will rationally prefer smaller operators who attract higher offset rates, and the weighting framework will direct additional support to organisations that are not WIN's competitors in regional markets but are treated as equivalents under the scheme's current design.

WIN's submissions are practical and targeted. Broaden the payment formula to reflect the true cost of regional broadcast journalism. Set weighting values that reflect structural reality rather than administrative convenience. Protect organisations that invest in news deserts from the establishment risk that currently makes those investments commercially irrational.

Regional journalism is not commercially viable and is unlikely to become so. The question the scheme must answer is whether it is valued enough to be sustained. WIN believes it is and urges the Government to design a scheme that reflects that belief in its detail, not just its intent.

WIN Network

18 May 2026

Contact: s47F

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